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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Fawaz Khouri,  
  
Plaintiff,

v.

Equifax Information Services, LLC;  
Experian Information Solutions, Inc.;  
CKS Prime Investments, LLC a/k/a CKS  
Prime Investment;  
Velocity Portfolio Group, Inc.; and  
CKS Financial, LLC a/k/a CKS Financial,  
  
Defendants.

Case No. 2:21-cv-02162-RFB-NJK

**STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER SUBMITTED IN  
COMPLIANCE WITH LR 26-1(b)**

Plaintiff Fawaz Khouri (“Plaintiff”), Defendants Equifax Information Solutions, Inc., Experian Information Solutions, Inc., CKS Prime Investments, LLC a/k/a CKS Prime Investment, and Velocity Portfolio Group, Inc. (collectively “the Parties”), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order.

The parties propose the following discovery plan and scheduling order:

1. Initial disclosures: ..... March 16, 2022
2. Amend pleadings and add parties: ... April 20, 2022
3. Expert disclosures (initial): ..... May 20, 2022

4. Expert disclosures (rebuttal): ..... June 21, 2022
5. Discovery cutoff date: ..... July 19, 2022
6. Dispositive motions: ..... August 18, 2022
7. Pretrial order: ..... September 19, 2022

Pretrial Order. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

Pretrial Disclosures: The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

Protective Order: The parties may seek to enter a stipulated protective order pursuant to Rule 26(c) prior to producing any confidential documents. Any such proposed order must be submitted by April 15, 2022.

Electronic Service: The parties agree that electronic service of discovery or other documents may be used. Such service must be sent to:

- a) for Plaintiff Fawaz Khouri, to
  - a. Eliyahu Babad, ebabad@steinsakslegal.com, and
  - b. Yolanda Walls, ywalls@steinsakslegal.com
- b) for Defendant Equifax Information Services, LLC, to:
  - a. Gia Marina, gmarina@clarkhill.com, and
  - b. Joyce Ulmer, julmer@clarkhill.com
- c) for Defendants CKS Prime Investments, LLC a/k/a CKS Prime Investment, and Velocity Portfolio Group, Inc., to:
  - a. Justin Penn, jpenn@hinshawlaw.com
- d) for Defendant Experian Information Solutions, Inc., to:
  - a. Jennifer Braster, jbraster@nblawnv.com

1 b. Benjamin Gordon, bgordon@nblawnv.com

2 c. Amy Reams, areams@nblawnv.com

3 e) for Defendant CKS Financial, LLC a/k/a CKS Financial:

4 a. Sean P. Flynn, Esq., sflynn@grsm.com

5 Alternative Dispute Resolution Certification: The parties certify that they met and conferred  
6 about the possibility of using alternative dispute-resolution processes including mediation,  
7 arbitration, and early neutral evaluation.

8 The parties have not reached any stipulations at this early stage.

9 Alternative Forms of Case Disposition Certification: The parties certify that they considered  
10 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use  
11 of the Short Trial Program (General Order 2013-01). The parties were not in agreement and  
12 therefore have not reached any stipulations at this stage.

13 Electronic Evidence:

14 Electronically stored information: The parties have discussed the retention and production  
15 of electronic data. The parties agree that service of discovery by electronic means, including  
16 sending original electronic files by email or a link to cloud storage is sufficient. The Parties agree  
17 to produce information in PDF or TIFF format to the extent practical. The parties reserve the right  
18 to revisit this issue if a dispute or need arises.

19 Electronic evidence conference certification: The parties at this early stage are unsure if  
20 they intend to present evidence in electronic format to jurors for the purposes of jury deliberations  
21 at trial. The parties discussed the presentation of evidence for juror deliberations but did not reach  
22 any stipulations as to the method as this early stage.

Dated: March 4, 2022

**CONTEMPORARY LEGAL SOLUTIONS**

/s/ Robert M. Tzall

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s/ Justin M. Penn [to seek pro hac vice admission]

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*CKS Prime Investment; and*  
*Velocity Portfolio Group, Inc.*

**SCHEDULING ORDER**

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_